

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

(1) KELI A. PUEBLO,

Plaintiff,

v.

Case No.: 23-cv-654-D

(1) STATE OF OKLAHOMA, *ex rel.*,
OKLAHOMA SCHOOL OF
SCIENCE AND MATHEMATICS,

Defendant.

DEFENDANT’S MOTION TO STAY PENDING DEADLINES

Defendant Oklahoma School of Science and Mathematics (“OSSM”) by and through counsel of record, Assistant Attorneys General Alejandra Brigida and Lauren Ray, respectively requests this Court stay all pending deadlines until Plaintiff has retained new counsel.

1. On December 5, 2024, the Court entered an Order extending deadlines by 60-days. [Doc 50].

2. On January 20, 2025, counsel for Plaintiff Katherine Mazaheri filed her Motion to Withdraw as Attorney Record and requesting a thirty (30) day extension of all deadlines. [Doc. 54].

3. The Court granted Ms. Mazaheri’s motion on January 21, 2025 giving Plaintiff thirty (30) days to retain new counsel and/or notice the Court as to how Plaintiff wishes to proceed. [Doc. 55].

4. The remaining deadlines in this matter are:

Deadline	Due Date
Defendant to file final exhibit list	2/3/2025
Defendant to file objections to Plaintiff's final exhibit list by:	2/3/2025
Plaintiff to file objections to Defendant's final exhibit list by:	3/7/2025
Discovery to be completed by:	3/7/2025
All dispositive and <i>Daubert</i> motions to be filed:	3/17/2025
Trial Docket	To be set
Designations of deposition testimony to be used at trial to be filed by:	5/2/2025
Objections and counter-designations to be filed by:	5/9/2025
Objections to be counter-designations to be filed by:	5/16/2025
Highlighted copy of depositions transcript(s) to be submitted by:	5/23/2025
Motions in limine; Requested voir dire; trial briefs; requested jury instructions to be filed by:	5/2/2025
Objections and responses to trial submissions to be filed by:	5/16/25
Final Pretrial Report due by:	5/2/2025

5. The requested stay is not for the purpose of delay or any other improper purpose.

6. At the time of filing this motion, the undersigned's office had not heard back from Plaintiff as whether or not she objects to the requested relief.

WHEREFORE, for the reasons stated above, Defendant respectfully requests this Court stay the remaining deadlines as outlined above until Plaintiff has obtained new counsel or provided notice to the Court as to how she wishes to proceed.

Respectfully submitted,

/s/ Lauren Ray

ALEJANDRA BRIGIDA, OBA#35381

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Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day February 2025, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing. I further certify that a true and correct copy of the foregoing document was to Katherine Mazaheri via the electronic noticing system to provide to plaintiff pursuant to the Court Order of January 21, 2025 [Doc. 55]:

/s/ Lauren Ray
Lauren Ray